

FIELD OPERATIONS BUREAU (FOB)

TRANSMITTAL NUMBER: 99-04 Corrective Action (CA) April 21, 1999

TO:
Measurement

**All DOB and Performance
County Staff**

SUBJECT/PURPOSE: **To Provide Review Procedures When Case
Reviews Cannot Be Completed:**
1. Likely Conclusions
2. Unable To Locate (Code 5) Vs. Not Subject
To Review (Code 2)

RELATED REFERENCE: **FNS Handbook 310 Sections 330-338, 442.1
and 442.3**

SUPERSEDES: **None**

EFFECTIVE DATE: **Upon Receipt**

BACKGROUND:

The Food and Nutrition Service (FNS) supervises the statistical sampling and review procedures for each state to ensure the accuracy of the project area's combined payment error rate for the Federal Fiscal Year (FFY). As part of this oversight process, FNS examines all cases in which reviews were not completed to see if they were appropriately dropped from the case universe. Those that FNS agrees were correctly dropped as not subject to review (NSTR/CODE 2) do not count against the state's case completion rate. All other dropped cases are viewed as potentially skewing the total case sample to lower the state's error rate, so a dollar penalty is incurred for these cases.

California's completion rate has been steadily declining (and the dollar penalty increasing) for the last six federal Fiscal Years for which data is available. From 1992-1997, the completion rates were 95.51, 91.18, 90.84, 88.56, 87.18 and 82.29 percent, respectively. If a sanction had been imposed for FFY 1997, approximately \$900,000 would have been added on because of the state's low completion rate.

This transmittal provides instructions for reviewers when they encounter cases that cannot be completed.

INSTRUCTIONS:

Case reviewers are to use the following instructions for processing cases that cannot be completed. Program Information Analysts are to re-review these cases against the instructions provided below. Cases that could be completed using likely conclusions or dropped using Code 2/NSTR are to be returned to the original reviewer for correction.

Likely Conclusions

When it appears that the review cannot be completed because verification(s) have not been obtained, the reviewer should first attempt to complete the case by making likely conclusions per Section 442.3 of the FNS Handbook 310 rather than dropping it for failure/refusal to cooperate.

In these situations, use the eligibility worker's actions in context with the case record, case record information, and quality control (QC) findings related to the case to make your conclusions.

Likely conclusions cannot be used for those elements related to non-citizen status, Social Security Number (SSN), and work requirements compliance, vehicle ownership when only a DMV report is available and employment and bank account information when the IEVS report is the only verification source. In addition, likely conclusions cannot be used when the certification period has expired because actual circumstances must then be used in the review.

Not Subject To Review (NSTR)

If the case cannot be completed using likely conclusions AND the head of household has not been located, yet there is documented evidence that the household existed, the reviewer shall use the NSTR criteria in FNS Handbook 310 Section 442.1 B for dropping the case.

In order to use Code 2 (NSTR) the reviewer must use two sources which are most likely to know the household's current address. This could include local homeless shelters, DMV, owner or property manager for the case record address, school officials, utility or telephone companies, relatives, or any other sources from the case record.

The source counts for verification purposes only when it provides a response and is properly documented. Note that an acceptable response includes instances in which the source indicates no knowledge of the clients whereabouts. The important factor is the **attempts** to locate the client. Documentation of these attempts must include the person's name, title (if appropriate), name of organization, phone number (or indicate no phone), date(s) of contact, and information obtained; see FNS handbook 310 sections 522 and 523.

If the household has not been located after the responses have been received, the reviewer must document that the household (payee) actually existed. The documentation must cover either two elements of eligibility or basis of issuance such as a birth certificate for age, and pay stub for income, or a statement from the landlord or other collateral contact for household composition. Two sources of verification are required.

As indicated above, the reviewer **MUST** document the efforts to locate the household as well as the evidence that the household did actually exist for the case to be dropped NSTR (Code 2). If documentation is not done, the case will be considered unable to locate (Code 5) and will count against the state's completion rate.

Refer to FNS Handbook 310 Sections 331-338 for additional factors which deem a case NSTR (Code 2). Note in particular that a case is NSTR (Code 2) if all the household members who could be interviewed moved out of state and have not returned by the time the reviewer attempts to contact the household. The availability of an authorized representative for interview does not make this case subject to review.

In summary, reviewers should attempt to complete a case by making likely conclusions rather than dropping it for failure/refusal to cooperate or because verifications have not been obtained. In addition, when a household cannot be located, the reviewer must pursue verifying the household's existence by documenting either two elements of eligibility or basis of issuance whenever possible.

This will allow the case to be coded NSTR (Code 2) rather than Unable to Locate (Code 5) which counts against the state's completion rate.

COUNTY INQUIRIES:

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